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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION**

ASHLEY SCHROEDER, KENDALL CLARK,
HALLI FIELDS, NATASHA GEORGE, JOSIE
GRIFFITHS, JADE BERNAL, DAHLIA
MCALLISTER, PRESLEY MCCASKILL,
ABIGAIL PLEVIN, VALERIE PETERSON, ELLA
TYUS, SIULOLOVAO FOLAU, ALEX LAITA,
BATIA ROTSHEIN, ZOE ALMANZA,
BEATRICE WETTON, MIA LOPEZ, DELANEY
HOPEN, CARLY WALLACE, SAVANNAH
SIEGRIST, ANASTASIA LIMA, MADELYN
LAFOLLETTE, ALEXANDRA HADEN, JOSIE
COLE, ALAINA THOMAS, VIVIAN DONOVAN,
ELISE HAVERLAND, RIVER RIBEIRO, SOPHIA
SCHMITZ, SYDNEY WEDDLE, CLAIRE
DALEY and ANNA MARIA KNIGHT,
Individually and on behalf of all those similarly
situated,

Plaintiffs,

v.

UNIVERSITY OF OREGON,

Defendant.

Case No.: 6:23-cv-01806-MC

**PLAINTIFFS' FIRST SET OF
INTERROGATORIES TO
UNIVERSITY OF OREGON**

The Plaintiffs, pursuant to the Federal Rules of Civil Procedure, propound the following Interrogatories on the Defendant, University of Oregon and request that these Requests be answered in writing within 30 days in accordance with the Federal Rules of Civil Procedure.

DEFINITIONS AND INSTRUCTIONS

“Document” means:

- a. All written, printed, typed, recorded or graphic matter of every type and description, however and by whoever prepared, produced, reproduced, disseminated or made, in your actual or constructive possession, custody or control, including but not limited to, all writings, e-mails, text messages, letters, minutes, bulletins, correspondence, memoranda, notes, instructions, literature, notebooks, records, agreements, contracts, notations of telephone or personal conversations or conferences, address books, interoffice communications, receipts, circulars, pamphlets, advertisements, electronic mail, instant messages, catalogs, social media posts, summaries, reports, books, invoices, checks, bills, graphs, photographs, drafts, data compilations, computer data sheets, computer data compilations, calendars, statistics, recordings, or data compilations from which information can be obtained or translated into reasonably usable form;
- b. The original and all other copies not absolutely identical;
- c. All drafts and notes (whether typed, handwritten or otherwise) made or prepared in connection with such Documents, whether used or not;
- d. All writings; and
- e. Production of electronically stored information in native format.

“Communication” or “Correspondence” means any contact, oral or written, formal or informal, at any time or place, under any circumstance, in any manner, whereby a statement of any

nature is transmitted or transferred, including any meeting or other conversation, and shall include, without limitation, any Document relating to any such contact.

“Relating to” means referring to, reflecting, responding to, commenting upon, recording, discussing, showing, describing, analyzing, constituting or in any way concerning.

“You” and “your” mean the party to whom this discovery request is directed and anyone else who possesses responsive information and who is employed by or affiliated with the party.

“Identify,” “state” or “describe” with respect to an oral communication, means to state the date thereof and its substance, and to identify the person who made the communication, the person to whom it was addressed, and any other person who heard the communication.

“Identify,” “state” or “describe” with respect to a natural person, means to provide identification sufficient to notice a deposition of such person and to serve such person with legal process, to require their attendance at such an examination. Such identification includes, but is not limited to name, occupation, title, address, and telephone numbers.

“Identify,” “state” or “describe” with respect to an incident or event should include, but not be limited to, the date, location, circumstances, and any witnesses to such occasion.

“Title IX” refers to 20 U.S.C. § 1681 *et seq.*, and 34 C.F.R. Part 106, requiring institutions to provide women and men with equal athletic treatment and benefits, equal athletic financial aid, and equal opportunities participate in varsity intercollegiate athletics. “Title IX” in these requests DOES NOT refer to sexual harassment (*i.e.* unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal, or physical conduct of a sexual nature).

INTERROGATORIES

INTERROGATORY 1: State the name and address of the person answering these interrogatories? Also, state the names and contact information of every person who assisted in answering these interrogatories.

ANSWER:

INTERROGATORY 2: State the name, addresses, and telephone numbers of all persons believed to have any knowledge concerning any of the facts, issues, or allegations raised in the Complaint regarding the treatment of men's and women's varsity teams or adding additional varsity participation opportunities for female students, or any of the defenses intended to be raised by the University of Oregon; and describe in summary fashion each such person's knowledge.

ANSWER:

INTERROGATORY 3: Produce a full list of the University of Oregon's athletic staff (coaches, assistants, support staff, trainers, administration, etc.) with dates of employment, salary, job title, and the sport each staff member works with from the 2014-15 academic year to the current academic year.

ANSWER:

INTERROGATORY 4: Identify and provide contact information for any individuals who have done calculations regarding student-athlete participation ratios and athletic financial aid ratios at the University of Oregon from the 2016-17 academic year to the current academic year.

ANSWER:

INTERROGATORY 5: Identify and provide the contact information for all employees at the University of Oregon who are currently involved in Title IX compliance in athletic participation, treatment and benefits, or financial aid, including Title IX or equity experts or consultants.

ANSWER:

INTERROGATORY 6: Identify all document names for those documents maintained by the University of Oregon Athletic Department that could be used for purposes of assessing Title IX compliance. The purpose of this Interrogatory is to ensure both parties are using the same vernacular when discussing documents used in the UO athletic department. For example, UO may have a term of art for the document used to track which student-athletes compete in competitions throughout each season, which would be unknown to Plaintiffs. Plaintiffs are requesting UO identify the terms used within the Athletic Department for documents used for things such as tracking facility schedules, facilities repairs or renovations, tracking participation, allocation of athletic financial aid, equipment or gear orders, etc.

ANSWER:

INTERROGATORY 7: Describe all steps the University of Oregon has taken to ensure that it is accommodating current and prospective students' athletic interests and ability to participate in varsity sports since the 2016-17 academic year.

ANSWER:

INTERROGATORY 8: Provide a list of students who have served as student managers for varsity teams since the 2016-17 academic year to present, separated by the specific sport. For each student team manager, describe any benefits provided to that student from UO (*i.e.*, housing assistance, compensation, scholarship/aid, access to competitions for free and/or discounted rate, gear, travel/accommodation support, etc.).

ANSWER:

INTERROGATORY 9: Please describe all steps the University of Oregon has taken to ensure the facilities used by varsity athletic teams are in compliance with Title IX.

ANSWER:

Under penalty of perjury, I disclose that the information provided by my answers is true and complete.

DATE: _____, 2024

NAME: _____

Dated: April 26, 2024

Respectfully submitted,

s/Jennifer J. Middleton

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CERTIFICATE OF SERVICE

I certify that on April 26, 2024, a true copy of the **PLAINTIFFS' FIRST SET OF INTERROGATORIES TO UNIVERSITY OF OREGON** was served as indicated below:

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